

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

*IN RE PORK ANTITRUST LITIGATION*

Case No. 0:18-cv-01776-JRT-HB

This Document Relates To:  
Direct Purchaser Plaintiffs actions

**DECLARATION OF BOBBY  
POUYA IN SUPPORT OF MOTION  
OF DIRECT PURCHASER  
PLAINTIFFS TO APPOINT  
INTERIM CO-LEAD COUNSEL**

I, Bobby Pouya, declare:

1. I am an attorney in the firm of Pearson, Simon & Warshaw, LLP (“PSW”) attorneys of record for Plaintiff Maplevale Farms, Inc., in the case styled as, *Maplevale Farms, Inc. v. Agri Stats, Inc., et al.*, Case No. 1:18-cv-01803 (D. Minn.) (“*Maplevale*”), which has been related in this District to other antitrust lawsuits filed by purchasers of pork in the United States.

2. I submit this declaration in support of the motion to appoint PSW and Lockridge Grindal Nauen PLLP (“LGN”) as Interim Co-Lead Class Counsel for a class of direct purchasers of pork in the United States.

3. I am one of the attorneys principally responsible for the handling of this matter. I am committed to prosecuting this case. If the Court appoints my firm as co-lead counsel in this litigation, PSW will devote the necessary resources and staff to support its leadership.

4. Since 2007 I have dedicated my career to working on complex litigation including antitrust and consumer class actions. During this time I have worked on dozens of class action lawsuits and numerous multidistrict antitrust lawsuits which have resulted in hundreds of millions of dollars in settlements and judgments on behalf of plaintiffs and class members. Some examples of cases in which I have taken a leadership role in my career include:

- *In re Polyurethane Foam Antitrust Litig.* (N.D. Ohio): I served on the executive committee on behalf of direct purchaser plaintiffs of this antitrust class action lawsuit alleging price fixing of polyurethane foam and polyurethane foam products by the largest manufacturers in the United States.
- *In re Fresh and Processed Potatoes Antitrust Litig.* (D. Idaho): I worked on the executive committee in this antitrust class action lawsuit alleging defendants exploited industry associations to implement coordinated supply restrictions in a manner that exceeded permissible agricultural cooperatives under the Capper-Volstead Act.
- *Senne, et al. v. Office of the Commissioner of Baseball, et al.*, Case No. 14-cv-0608 (N.D. Cal): I represent minor league baseball players in this class action alleging that Major League Baseball and its member clubs violate the FLSA and state wage and hour laws by failing to pay minor league baseball players minimum wage and overtime.

- *Higgins v. Paramount Pictures Corp. (and related cases)* (L.A. Sup. Ct.): I represent motion picture profit participants (i.e. writers, actors, directors, and producers) in related class action lawsuits alleging several major motion picture studios have violated their contracts by failing to make profit participation payments based on all home video revenues generated by the motion pictures.

5. I am also currently serving as one of the lead attorneys representing direct purchaser plaintiffs in *In re Broiler Chicken Antitrust Litig.*, Case 1:16-cv-08637, N.D. Ill. (“*Broiler Chicken*”). As set forth in the concurrently filed motion for lead counsel, the conspiracy alleged against the pork industry defendants in this case mirrors the conduct alleged against the defendants in *Broiler Chicken*.

6. My experience and qualifications are further set forth in the PSW Firm Resume, attached to the Affidavit of W. Joseph Bruckner Describing Exhibits Submitted in Support of Motion of Direct Purchaser Plaintiffs to Appoint Interim Co-Lead Counsel as Exhibit E.

7. I believe my experience in *Broiler Chicken* as well as the numerous other relevant complex class actions and antitrust cases I have worked on throughout my career will ensure that I am able to fulfill my duties as class counsel in this case.

8. I have been actively involved in all facets of this case since its inception, and willing to continue dedicating the time and the resources necessary to successfully adjudicate this case on behalf of the direct purchaser plaintiffs as part of the co-lead counsel team.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 26, 2018, at Sherman Oaks, California.

s/ Bobby Pouya

Bobby Pouya